

AB:DAS/SSA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

JALEESA WALLACE,

Defendant.

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TO BE FILED UNDER SEAL

**AFFIDAVIT AND
COMPLAINT IN
SUPPORT OF AN
ARREST WARRANT**

(T. 18, U.S.C., §§ 641, 2)

No. 21 MJ 808

EASTERN DISTRICT OF NEW YORK, SS:

Jacabed Ventura, being duly sworn, deposes and states that she is a Special Agent with the United States Postal Service, Office of Inspector General, duly appointed according to law and acting as such.

In or about and between February 2021 and July 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JALEESA WALLACE, together with others, did knowingly and willfully embezzle, steal, purloin and convert to her use and the use of another, and without authority, sell, convey and dispose of, money and things of value of the United States and of any department or agency thereof, to wit: money orders from the United States Postal Service ("USPS"), the aggregate value of which exceeded \$1,000.

(Title 18, United States Code, Sections 641 and 2)

The source of your deponent's information and the grounds for her belief are as follows¹:

1. I am a Special Agent with the United States Postal Service, Office of Inspector General and have been involved in the investigation of numerous cases involving the theft, destruction and delay of mail. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

2. On or about February 1, 2021, the station manager for the United States Post Office located at 726 Utica Avenue in Brooklyn, New York (the "Utica Avenue Post Office"), whose identity is known to me, placed an order for 10,000 blank postal money orders (the "stolen money orders"), which can be deposited with financial institutions in exchange for up to \$1,000 per money order. A USPS shipment tracking database shows that the stolen money orders were delivered to the Utica Avenue Post Office at approximately 8:02 a.m. on February 13, 2021.

3. After the stolen money orders arrived at the Utica Avenue Post Office, they were not entered into the facility's system, in violation of USPS protocol. As a result, the station manager, who was not on duty that day, was unaware that they had arrived. She subsequently placed an order for a new set of money orders and indicated that the stolen money orders had never arrived at the Utica Avenue Post Office. Law enforcement was subsequently alerted regarding the stolen money orders.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. The stolen money orders were packaged and shipped in four boxes. Law enforcement has been alerted by several financial institutions that over 100 of the stolen money orders have since been deposited at those institutions in exchange for United States currency.

5. Law enforcement developed information that an individual named Willie Cook was in possession of the stolen money orders. On July 8, 2021, the Honorable Robert M. Levy, United States Magistrate Judge for the Eastern District of New York, signed a search warrant authorizing a search of Cook's residence in Brooklyn, New York, as well as his cellular phone. See 21 MJ 798.

6. On July 9, 2021, law enforcement executed the search of Cook's residence and found him to be in possession of approximately 300 of the stolen money orders. Cook was also in possession of approximately 21 credit cards, including prepaid debit cards from the Department of Labor that are used for unemployment benefits, that were not in Cook's name. Law enforcement also recovered approximately \$1,200 in cash from Cook's apartment.

7. Cook was then arrested. After arresting Cook, I advised him of his Miranda rights and he agreed to speak with me. He told me, in sum and substance, that he was "holding" the stolen money orders for WALLACE and that WALLACE had two large boxes of postal money orders, one that she received in March 2021, and that she was storing them in her house. He stated that WALLACE only gave him some money orders to "hold," so he believed the rest were with WALLACE. He further stated that on a prior date, WALLACE told him that a USPS employee dropped off money orders at the facility where she was working, and saw her outside in her uniform, and handed them to her, and WALLACE was very excited that she had gotten the money orders. Cook further stated WALLACE told him she took the money orders delivered by the USPS employee and put them in her car.

8. I also learned, from a review of USPS records, that WALLACE is a USPS employee who was on duty at the Utica Avenue Post Office at the time the stolen money orders were delivered to the Utica Avenue Post Office. In addition, Cook is not a USPS employee, so it is unlikely that Cook would have had access to the stolen money orders during their shipment or once delivered to the Utica Avenue Post Office without the assistance of WALLACE.

9. Additionally, on a prior date, I received a complaint from a USPS customer who stated that she had mailed money orders at a USPS facility, and the money orders did not arrive at their destination. I observed the “clerk number” for the transaction and the clerk for the transaction was WALLACE.

10. On July 9, 2021, the Honorable Robert M. Levy, United States Magistrate Judge for the Eastern District of New York, signed a search warrant authorizing a search of WALLACE’s residence at 475 Rockaway Parkway, Brooklyn, New York (the “WALLACE Premises”), as well as her cellular phone. See 21 MJ 803 (the “Warrant”).

11. On July 9, 2021, law enforcement executed the search of the WALLACE Premises and found her to be in possession of approximately 3,189 of the stolen money orders, contained in two large boxes, as photographed below:



12. Law enforcement also found at the WALLACE Premises approximately 37 prepaid debit cards from the Department of Labor that are used for unemployment benefits that were not in WALLACE's name. In addition, law enforcement found approximately 42 pieces of mail from the Department of Labor that are also not in WALLACE's name.

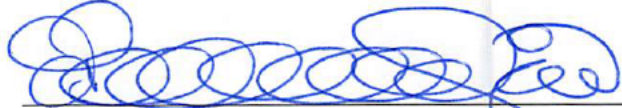
13. Law enforcement also recovered approximately \$42,640 in cash from the WALLACE Premises, as photographed below:



14. WALLACE was not present at the time the Warrant was executed. Law enforcement contacted WALLACE prior to the execution of the Warrant, and she stated that she was in New Jersey and was unable to return at that time. WALLACE's current whereabouts are unknown. Today, July 12, 2021, I spoke with an attorney contacted by WALLACE and am attempting to arrange WALLACE's surrender.

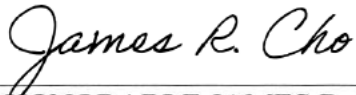
15. Accordingly, as WALLACE has not yet surrendered, I request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the Internet. Premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving targets, such as WALLACE, an opportunity to flee from prosecution, destroy or tamper with evidence, and change patterns of behavior.

WHEREFORE, your deponent respectfully requests that the Court issue an arrest warrant under seal for the defendant JALEESA WALLACE so that she may be dealt with according to law.



Jacobed Ventura
Special Agent, United States Postal Service, Office
of Inspector General

Sworn to before me by telephone this
12th day of July, 2021



THE HONORABLE JAMES R. CHO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK